



McKinley & Ryan
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238 West Miner Street
West Chester, PA 19380
United States

Billed To
Stephen Oross
17 Carlie Court
Fleetwood PA 19522

Date of Issue
02/03/2025

Due Date
02/18/2025

Invoice Number
159-PEB

Amount Due (USD)
\$773,074.50

Description	Rate	Qty	Line Total
Initial Telephone Call 10/8/21 - Initial Telephone Call with Client	\$850.00	1	\$850.00
Initial Consultation 10/18/21 - Initial consultation meeting	\$850.00	1.1	\$935.00
Review/Research/Email 10/20/21 - Review client documents; Google research re: Kutztown University online offerings and client's public activities and related issues re: case evaluation (5.3); Email to client re: summary and next steps (.4)	\$850.00	5.7	\$4,845.00
Zoom Conference 10/27/21 - Zoom conference with client re: IAP status and next steps	\$850.00	1	\$850.00
Email 11/1/21 - Email with Client re: union grievance status	\$850.00	0.2	\$170.00
Review/Email/Research 11/2/21 - Review of client records; prepare chronology (1.8); Review Union contract and email to client re: federal claims and litigation strategy (1.2); Research Remote RA caselaw (1.1)	\$850.00	4.1	\$3,485.00
Research/Email 11/3/21 - Research applicable EEOC Regulations and case law re: REMOTE RA (2.7)	\$850.00	2.7	\$2,295.00

Telephone Call/Prepare/Research 11/4/21 - Telephone call with client re: Complaint strategy (.7); Prepare Complaint and Chronology (4.5); PASSHE Website Research (1.0)	\$850.00	6.2	\$5,270.00
Zoom Conference/Prepare 11/8/21 - Zoom conference with client, Department Chair and Union President re: legal claims and factual background (1.0); Draft Complaint and related factual research (5.4)	\$850.00	6.4	\$5,440.00
Prepare/Review 11/9/21 - Prepare Complaint (4.5); Review additional Client Docs (1.0)	\$850.00	5.5	\$4,675.00
Prepare/Edit/Review/Telephone Call 11/10/21 - Prepare, edit, review Complaint (10.0); Telephone call with Client re: complaint progress and status (1.0)	\$850.00	11	\$9,350.00
Review/Revise/Edit/Telephone Call 11/11/21 - Review, revise, edit Complaint; Telephone call with Client re: same	\$850.00	1	\$850.00
Prepare 11/12/21 - Prepare Complaint	\$850.00	9	\$7,650.00
Review/Revise/Edit 11/13/21 - Review, revise, edit Complaint	\$850.00	1.3	\$1,105.00
Review/Revise/Edit/Research 11/14/21 - Review, revise, edit Complaint (3.2); Research 1st Amendment claims (1.0); Review Covid-19 articles/research (.5)	\$850.00	4.7	\$3,995.00
Telephone Call/Review/Revise/Edit/Email/Prepare 11/15/21 - Email to client and Union re: draft Complaint (.2); Telephone call with Client re: draft Complaint (1.3); Review, revise, edit and finalize Complaint (2.4); Prepare filing package and related correspondence to PASSHE Counsel, Client and Union (1.4)	\$850.00	5.3	\$4,505.00
Research 11/16/21 - TRO/research and related correspondence to Client re: process	\$850.00	2.1	\$1,785.00
Telephone Call/Email/Prepare/Research 11/17/21 - Prepare TRO Memorandum and related research (10.3); Telephone call with Client re: same (.6)	\$850.00	10.9	\$9,265.00
Telephone Call/Prepare/Review/Revise/Edit 11/18/21 - Telephone call with Client re: TRO and declarations (.7); Prepare, review, revise, edit TRO (10.9)	\$850.00	11.6	\$9,860.00
Prepare/Review/Revise/Edit/Telephone Calls 11/19/21 - Prepare, review, revise, edit TRO Memorandum (7.2); Telephone call with Client re: same (.3)	\$850.00	7.5	\$6,375.00

Telephone Call/Prepare 11/21/21 - Telephone call with Client re: TRO revisions (.5); Prepare, review, revise, edit TRO Memorandum (6.7)	\$850.00	7.2	\$6,120.00
Prepare/Review/Revise/Edit 11/22/21 - Prepare, review, revise, edit Motion for TRO	\$850.00	12.9	\$10,965.00
Prepare/Review/Revise/Edit/Finalize 11/23/21 - Prepare, review, revise, edit, finalize TRO Memorandum and related documents; prepare for filing and service	\$850.00	13.1	\$11,135.00
Emails/Prepare/Telephone Call 11/24/21 - Prepared, filed, and served Amended Notice of Motion (.3); Telephone call with Court re: TRO Scheduling; Email to Client re: same (.3); Emails to Counsel re: service (.2)	\$850.00	0.8	\$680.00
Email/Research 11/29/21 - Email to Union re: TRO scheduling and client's status (.3); LEXIS Research re: Covid-19 and irreparable harm (2.3); Research re: ADA/Covid cases in U.S. and related proceedings in EEOC and/or Federal Court (1.2)	\$850.00	3.8	\$3,230.00
Summary 11/30/21 - Summarize case plan/update chronology	\$850.00	1	\$850.00
Email 12/1/21 - Email to Client re: Status Conference re: TRO	\$850.00	0.1	\$85.00
Prepare 12/3/21 - Prepare draft Finding of Facts/Conclusions of Law re: TRO (2/3 N/C)	\$850.00	0	\$0.00
Telephone Calls/Prepare/Research 12/6/21 - Prepare for TRO Hearing (1.5); Research re: TRO/Section 504 elements and history (4.2); Telephone call with client re: prepare for TRO Hearing and discovery (.7)	\$850.00	6.4	\$5,440.00
Telephone Call/Prepare/Attend 12/7/21 - Telephone call with Client re: TRO prep (.5); Prepare Visual graphic of teaching history/Remote teaching (1.2); Attend TRO hearing (.6)	\$850.00	2.3	\$1,955.00
Review 12/8/21 - Review Client materials re: technology for remote teaching	\$850.00	0.4	\$340.00
Telephone Call/Emails 12/14/21 - Telephone call with Client re: TRO (.2); Emails to client re: same and winter contract (.6)	\$850.00	0.8	\$680.00

Telephone Call/Review/Emails 12/20/21 - Telephone call with Client re: TRO status/EEOC filing (.6); Review Client materials re: CBA addendum and remote work for 2021- 22 and Emails with Client re: same (.4)	\$850.00	1	\$850.00
Telephone Calls/Review/Email 12/21/21 - Telephone calls with Client re: preparation for telephone call with OAG and recap/next steps (.4); Review Client documents and email re: same (.5); Telephone call with OAG re: TRO/PI procedure (.2); Email to OAG re: same (.2)	\$850.00	1.3	\$1,105.00
Prepare 12/22/21 - Prepare Motion to Extend TRO	\$850.00	3.9	\$3,315.00
Telephone Call/Email/Prepare/Review/Revise/Edit 12/23/21 - Telephone call with Client re: Motion to Extend (.6); Email to Counsel re: Position status (.3); Prepare, review, revise, edit Motion to Extend TRO (5.2)	\$850.00	6.1	\$5,185.00
Prepare 12/27/21 - Prepare mediation memorandum and settlement package for Judge Rice	\$850.00	3.6	\$3,060.00
Email/Telephone Call 12/28/21 - Email to client re: status (.1); Telephone call with Judge Rice re: TRO/mediation (.1); Email to Judge re: same (.3)	\$850.00	0.5	\$425.00
Telephone Call 1/3/22 - Telephone call with Client re: TRO/mediation session; Email to Client re: same	\$850.00	0.5	\$425.00
Telephone Call 1/6/22 - Telephone call with client re: TRO resolution; re: same	\$850.00	0.5	\$425.00
Emails 1/7/22 - Emails with OAG re: final details of TRO resolution; Email to Judge Rice re: same	\$850.00	0.5	\$425.00
Review/Email 1/10/22 - Review EEOC Docs re: Client's Charge/Emails to Client re: same (.6); Post-TRO Consult with outside counsel; Telephone Call re: same (1.1)	\$850.00	1.7	\$1,445.00
Telephone Call/Email 1/11/22 - Consult with outside counsel re: litigation strategy and valua- tion (1.2); Email to Client re: TRO Conclusion and RA Status (.3)	\$850.00	1.5	\$1,275.00
Prepare/Email 1/12/22 - Prepare EEOC filing and related documents (1.2); Email to EEOC re: Charge and Incorporation of Federal Complaint (.4)	\$850.00	1.6	\$1,360.00
Telephone Call/Telephone Consultation	\$850.00	1.4	\$1,190.00

Email 1/13/22 - Telephone call with client re: status and discovery planning (.8); Telephone consult with Ralph Lamar (.6)	\$850.00	0.4	\$340.00
Prepare/Email 1/17/22 - Prepare Draft Rule 26(f) Report; Email to OAG re: same (1.3)	\$850.00	1.3	\$1,105.00
Prepare/Email 1/18/22 - Prepare Draft SEDs and related internet research; Email to Client re: same	\$850.00	2.3	\$1,955.00
Telephone Call/Prepare/Review/Revise/Edit/Research 1/19/22 - Telephone call with client re: SED's (1.8); Prepare, review, revise, edit SED's and corresponding research on KU's website (3.2)	\$850.00	5	\$4,250.00
Research/Revise/Email 1/20/22 - Internet research and revision to SED's; Email to Client re: same (2.1); Finalize Rule 26 (f) Report and related correspondence to Client and OAG (.2);	\$850.00	0.5	\$425.00
Consultation/Prepare/Review/Finalize 1/21/22 - Consult with outside counsel re: case strategy (1.1); Prepare draft document requests (1.8); Review and finalize SED's (.3)	\$850.00	3.2	\$2,720.00
Telephone Calls/Prepare/Attend 1/27/22 - Telephone calls with EEOC re: charging documents (.3); Prepare PHRC dual filing forms and related correspondence to EEOC (.2); Attend Rule 16 conference (.5); Telephone call with client re: same and discovery planning (.6)	\$850.00	1.6	\$1,360.00
Telephone Call 2/2/22 - Telephone consult with outside counsel re: legal claims and settlement valuation	\$850.00	0.7	\$595.00
Prepare/Emails 2/11/22 - Annotate Complaint and Answer; prepare discovery demand (.6); Emails with Client and OAG re: discovery scheduling (.2)	\$850.00	0.8	\$680.00
Prepare 2/14/22 - Annotate Complaint/Answer; prepare discovery outline	\$850.00	2.1	\$1,785.00
Prepare/Review/Revise/Edit 2/15/22 - Prepare, review, revise, edit discovery requests and planning and related correspondence to client	\$850.00	3.5	\$2,975.00
Telephone Call 2/16/22 - Telephone call with Client re: discovery plan and next steps	\$850.00	1.3	\$1,105.00
Telephone Consultation/Prepare 2/24/22 - Telephone consult with Ralph Lamar re: case strategy (.7); Prepare Notices of Deposition for AM and JW and related corr. to	\$850.00	1	\$850.00

Update/Prepare/Review 2/25/22 - Updated chronology and conduct internet document discovery (5.2); Review additional Client Docs (.3)	\$850.00	5.5	\$4,675.00
Prepare 2/28/22 - Prepare Doc production; deposition outlines	\$850.00	5.5	\$4,675.00
Telephone Call/Research/Prepare 3/1/22 - Telephone call with Client re: deposition preparation and discovery plan (1.2); Research re: damage claims (2.2 N/C); Deposition preparation - Weidman and Martin (2.5)	\$850.00	3.7	\$3,145.00
Prepare/Attend/Telephone Call/Email 3/2/22 - Prepare for Martin deposition (.6); Attend Martin deposition (1.5); Telephone call with Client re: same (.6); Review and email RL cases re: Section 504 claims and Remedies (1.1)	\$850.00	3.8	\$3,230.00
Attend/Email 3/4/22 - Attend zoom faculty witness interview and write-up/Email to RL	\$850.00	2.5	\$2,125.00
Telephone Call/Prepare/Attend 3/4/22 - Telephone call with RL re: deposition strategy (.4); Prepare for Weidman deposition (3.2); Attend witness interview (1.6)	\$850.00	5.2	\$4,420.00
Email/Telephone Call/Prepare/Attend 3/7/22 - Telephone call with RL re: JW deposition strategy (.4); Prepare for JW deposition (2.6); Attend zoom meeting with client and co-counsel re: deposition preparation; JW deposition (5.0); Email to Client re: discovery plan (.4)	\$850.00	8.4	\$7,140.00
Review/Email 3/8/22 - Review of client records; prepare chronology and email to client re: document production	\$850.00	1.3	\$1,105.00
Meeting 3/9/22 - Witness interview	\$850.00	1.9	\$1,615.00
Emails 3/10/22 - Email to Hershey Medical re: Eisen deposition; Emails to Client and OAG re: same	\$850.00	0.8	\$680.00
Emails 3/15/22 - Emails to Counsel and Client re: Eisen deposition scheduling	\$850.00	0.1	\$85.00
Telephone Call/Review/Emails/Prepare 3/21/22 - Telephone call with Client re: case strategy and discovery (.7); Review documents from KU witness (.5); Email to RL re: discovery status and prepare for conference with Court (.3); Email to Client re: Fall RA Request (.1)	\$850.00	1.6	\$1,360.00
Prepare	\$850.00	0.3	\$255.00

Telephone Call 3/23/22 - Telephone call with RL re: discovery planning (.9); Edit draft confidentiality stipulation and Email to RL re: same (.3)	\$850.00	1.2	\$1,020.00
Email/Review/Edit 3/24/22 - Email to Client re: Status Conference (.1); Review, edit Jury Instructions and internet materials re: 1st A Claim; Email to RL re: same (.6) (N/C)	\$850.00	0.1	\$85.00
Telephone Call 3/29/22 - Telephone call with Hershey Medical re: documents and preparation schedule for Eisen deposition	\$850.00	0.2	\$170.00
Telephone Calls/Zoom Meeting 3/31/22 - Telephone call with Client and Dr. Eisen re: deposition preparation (.6); Zoom Deposition of Dr. Howard Eisen (1.4); Telephone call with client re: Eisen deposition and next steps (.6)	\$850.00	2.6	\$2,210.00
Prepare/Email/Review 4/1/22 - Prepared case issues (update and coordinate evidence in related cases) (1.1); Email to RL re: deposition update and preparation for status conference (.3); Review file materials re: witnesses and compile for discovery planning (1.2); Review JW deposition transcripts (1.6)	\$850.00	4.2	\$3,570.00
Conference Call/Telephone Calls 4/4/22 - Telephone call with RL re: status conference and discovery issues (.8); Status conference with court (.2); Telephone call with client re: discovery strategy and next steps (.6)	\$850.00	1.6	\$1,360.00
Emails 4/7/22 - Emails to RL and Client re: plans and docs for witness interviews and informal discovery plan; website research and evidence review/organization	\$850.00	2.4	\$2,040.00
Emails/Prepare/Attend/Review 4/8/22 - Email to OAG re: discovery; Prepare Supp'l Doc production (1.9) Review and prepare materials for faculty witness interviews; Email to RL and Client re: same (1.5)	\$850.00	3.4	\$2,890.00
Telephone Call/Zoom Conference 4/10/22 - Telephone call with RL re: witness follow-up (.4); Zoom Conference re: witnesses and interview planning (1.3)	\$850.00	1.7	\$1,445.00
Telephone Call/Email 4/12/22 - Telephone call with Client and RL re: witness follow-up	\$850.00	0.4	\$340.00
Prepare/Email 4/19/22 - Prepare Deposition Notices for named defendants (.4); Email to OAG re: late discovery (.2)	\$850.00	0.6	\$510.00
Review/Revise/Edit	\$850.00	2.4	\$2,040.00

Emails 4/26/22 - Emails to Client, RL and KU Faculty re: witness instructions	\$850.00	0.9	\$765.00
Prepare 4/27/22 - Prepare outline RFA2	\$850.00	1.4	\$1,190.00
Email 5/5/22 - Email to OAG re: JP/KH re: Deposition Notices	\$850.00	0.1	\$85.00
Review/Analyze/Prepare/Emails 5/11/22 - Review/Analyze Supreme Court Decision and emails to RL and Client re: same (2.8); Prepare for meeting with Union President (.4)	\$850.00	3.2	\$2,720.00
Zoom Conference/Research/Telephone Call/Review 5/12/22 - Zoom conference call with union president (1.3); Review of KU records (.8); Research re: Section 504 damages/immunities (1.8); Telephone call with client re: discovery status, witness interviews; and email re: KU doc. production and next steps (1.2)	\$850.00	5.1	\$4,335.00
Zoom Conference/Prepare/Review/Attend/Emails 5/13/22 - Prepare for witness interviews (.8); Review defendant's document production (3.5); Attend faculty witness interviews (2.5); Prepare for Pena deposition (3.5); Email to RL re: interview summaries (1.0)	\$850.00	11.3	\$9,605.00
Emails/Prepare 5/16/22 - Email to OAG re: Pena deposition and litigation schedule (.2); Review KU production and prepare for Pena deposition (4.0); Email to RL re: same (.2)	\$850.00	4.4	\$3,740.00
Telephone Call/Meeting 5/20/22 - Status conference with court (.1); Meeting with RL re: discovery planning/case strategy (2.5)	\$850.00	2.6	\$2,210.00
Telephone Call/Prepare 5/24/22 - Telephone call with Client re: case status/next steps (1.5); Prepare JW/AM deposition annotations and Pena deposition outline (5.2)	\$850.00	6.7	\$5,695.00
Review/Prepare 5/23/22 - Review of defendant records/prepare chronology, case issues	\$850.00	3.5	\$2,975.00
Emails 5/25/22 - Emails to RL and Client re: deposition planning	\$850.00	0.1	\$85.00
Telephone Call 6/1/22 - Telephone call with RL re: deposition schedule/preparation	\$850.00	0.2	\$170.00
Emails/Prepare/Research	\$850.00	0.9	\$765.00

6/3/22 - Email to Client re: FMLA issues and update on medical leave (1.5);
 Emails to counsel re: deposition schedule; prepare and serve revised
 Notices of Deposition (.6); Research 1st A cases and email to RL re:
 summary/status (1.5 N/C)

Telephone Call/Prepare/Email 6/6/22 - Telephone call with client re: discovery issues (1.4); Prepare outline for Pena deposition (.6); Email to client re: medical status and RA letter (.4)	\$850.00	2.4	\$2,040.00
Email 6/7/22 - Email to counsel re: discovery status	\$850.00	0.2	\$170.00
Emails/Telephone Call/Review 6/14/22 - Emails to RL and Client re: IT issues (.4); Telephone call with EEOC re: charge status (.1); Review defendant's discovery documents (.8)	\$850.00	1.3	\$1,105.00
Email/Prepare/Review/Revise/Edit 6/15/22 - Email to Counsel re: discovery issues/missing production (.4); Prepare, revise, review, edit Second Request for Admissions and corresponding discovery review/Chronology update (7.2)	\$850.00	7.6	\$6,460.00
Telephone Calls/Prepare 6/16/22 - Telephone call with Client re: deposition preparation (.6); Prepare for deposition of Jesus Pena (6.3); Telephone call with RL re: Pena deposition preparation (.6); Prepare Supp'l Doc Production and corresponding review of Client records and website research (1.0)	\$850.00	8.5	\$7,225.00
Email/Telephone Calls/Attend 6/17/22 - Telephone calls with Client re: Pena deposition and recap (.7); Attend deposition of Jesus Pena (5.7); Telephone calls with RL re: Pena deposition strategy and recap (.7); Telephone call with OAG re: confidentiality stipulation and resolution of discovery disputes (.3); Email to Counsel re: draft confidentiality stipulation (.2)	\$850.00	7.6	\$6,460.00
Review/Emails 6/20/22 - Review defendant's supplemental discovery production, privilege log, and RFPD (.5); Emails to RL and Client re: same (.3)	\$850.00	0.8	\$680.00
Prepare/Research/Email 6/21/22 - Prepare draft response to defendant's Request for Production of Documents; email to client re: same (.4); Research ADA /PHRA damages and immunities; email to RL re: same (1.9)	\$850.00	2.3	\$1,955.00
Telephone Conference Call 6/22/22 - Telephone conference call with RL and Client re: discovery responses and final deposition/discovery items	\$850.00	1.9	\$1,615.00
Prepare/Meeting 6/23/22 - Prepare for KH deposition (3.0); Faculty Witness interview (1.6)	\$850.00	4.6	\$3,910.00
Prepare	\$850.00	4.5	\$3,825.00

Prepare/Emails/Attend/Telephone Call 6/27/22 - Prepare case issues/update and annotate for client deposition preparation (1.2); Telephone call with client re: deposition preparation and discovery follow-up (.6); Email to client re: same (.5); Attend status telephone conference with Judge (.4); Email to client re: conference report (.3); Email to counsel re: client's deposition (.1); Telephone call with RL re: preparation for KH deposition (.5); Email to Judge Llorett's chambers re: mediation request (.2)	\$850.00	3.8	\$3,230.00
Prepare 7/5/22 - Client deposition preparation	\$850.00	5.9	\$5,015.00
Email/Attend 7/6/22 - Email to RL re: deposition preparation/client preparation (.3); Attend deposition preparation with client (8.0)	\$850.00	8.3	\$7,055.00
Telephone Call 7/18/22 - Telephone call with RL re: emergency discovery extension, status and case backup	\$850.00	0.4	\$340.00
Telephone Call/Review/Revise/Edit/Emails 7/19/22 - Email Judge Lloret re: mediation scheduling (.1); Telephone call with RL re: discovery completion and Motion to Compel (.7); Review, revise, edit letter to Judge S.re: document dispute and related case review (3.1); Review witness documents and email re: same (1.8)	\$850.00	5.6	\$4,760.00
Review/Revise/Edit/Correspondence/Email 7/20/22 - Revise deposition exhibit list; correspondence to court reporter re: same (.4); Review Pena deposition and email to client re: follow-up discovery issues (2.2); Review, revise, edit responses to discovery requests and correspondence to client and co-counsel re: same (1.9); Research work-product issue re: motion to compel and email to RL re: same (.8)	\$850.00	5.3	\$4,505.00
Email/Attend 7/21/22 - Email to client re: discovery responses and deposition preparation (1.7); Attend zoom meeting with client re: discovery issues and strategy (2.0)	\$850.00	3.7	\$3,145.00
Telephone Calls 7/25/22 - Telephone calls with Judge L's Chambers, Counsel and Client re: mediation scheduling (.2); Status conference with Court and all Counsel (Judge S.) (.4)	\$850.00	0.6	\$510.00
Review/Research/Email 7/26/22 - Review Client add'l discovery documents (2.0); Research re: history of fundamental alteration std. and Email to RL re: same (2.7)	\$850.00	4.7	\$3,995.00

Prepare/Email 7/27/22 - Prepared case issues and email to Client re: same (1.8); Prepare for Client deposition session (2.2); Email to Judge's Chambers re: coordination of mediations for related cases (.2)	\$850.00	4.2	\$3,570.00
Email/Research 8/2/22 - Research re: Covid employment cases nationwide (.8); Review client documents; Emails to client and RL re: same, and privilege issue/decision re: motion to compel (.5)	\$850.00	1.3	\$1,105.00
Emails/Prepare/Review 8/3/22 - Email to Client and RL re: current and subsequent document productions and delays (3.4); Prepare Plaintiff's supplemental docu- ment production pp. 354-393 (.8); Review old KH transcript (1.2); Email to Client re: faculty assessment data (.3)	\$850.00	5.7	\$4,845.00
Emails/Review/Revise/Edit/Attend 8/5/22 - Email to Client re: KU fall policies and legal analysis (.4); Review, revise, edit response to KU Request for Production of Documents (.5); Attend Zoom Conference re: deposition preparation and document review (2.3); Emails to OAG re: missing discovery and Client deposition (.7)	\$850.00	3.9	\$3,315.00
Prepare/Attend/Review 8/11/22 - Prepare Amended SED's and corresponding file review (.5); Attend Zoom Conference with Client re: deposition preparation (1.8); Reviewed Defendant's Response to RFA2 and email to Client re: same (.4)	\$850.00	2.7	\$2,295.00
Email/Telephone Calls/Prepare/Attend 8/12/22 - Email to Client re: finalizing discovery documents (.2); Telephone calls with Client re: deposition preparation (1.0); Prepare for deposition; Review podcasts and Client materials (1.9); Attend Client deposition (6.0); Telephone call with Client re: deposition recap and fol- low-up (.8)	\$850.00	9.9	\$8,415.00
Telephone Call 8/15/22 - Telephone call with RL re: discovery documents and prepara- tion for Focus Group	\$850.00	0.8	\$680.00
Telephone Call/Email 8/17/22 - Faculty Witness Interview (1.8); Email to RL re: research questions on attorney-client privilege (.3)	\$850.00	2.1	\$1,785.00
Prepare 8/19/22 - Prepare for Focus Group - review questionnaire and prelimi- nary document selection; Email to Client re: same (2.2); Emails to OAG re: settlement (.3)	\$850.00	2.5	\$2,125.00
Telephone Calls/Prepare/Edit 8/22/22 - Telephone call with RL re: focus group (.8); Prepare focus group exhibits; prepare outline (2.3); Edit focus group questionnaire (1.8)	\$850.00	4.9	\$4,165.00

Email/Telephone Call/Prepare/Review/Revise/Edit 8/23/22 - Email to client re: mediation and focus group preparation (.2); Telephone call with RL re: focus group preparation (.6); Prepare focus group consolidated/redacted admissions (1.9); Review, revise, edit focus group questionnaire (4.8)	\$850.00	7.5	\$6,375.00
Telephone Call/Prepare 8/24/22 - Telephone call with client re: Focus Group preparation (.7); Prepare for Focus Group (6.2)	\$850.00	6.9	\$5,865.00
Telephone Call/Prepare/Edit 8/25/22 - Telephone call with RL re: Focus Group preparation (.2); Prepare for Focus Group - edit jury instructions, prepare outline for opening, visuals and presentation format/content (9.8)	\$850.00	10	\$8,500.00
Prepare 8/26/22 - Prepare for Focus Group - revise jury instructions, verdict slip opening; Prepare/revise outline and visuals	\$850.00	15.5	\$13,175.00
Email/Telephone Calls/Prepare/Attend 8/27/22 - Prepare for Focus Group (1.5); Telephone call with Client re: Focus Group recap (.4); Attend Focus Group (5.0); Telephone call with Client re: recap of Focus Group (.2); Meeting with RL re: same (.8); Email to Client re: next steps (.8)	\$850.00	8.7	\$7,395.00
Emails 8/30/22 - Emails to Client and RL re: templates for Settlement	\$850.00	0.4	\$340.00
Telephone Call 8/31/22 - Telephone call with RL re: Mediation Memo	\$850.00	0.5	\$425.00
Prepare/Edit/Revise/Emails 9/1/22 - Prepare Mediation memo draft (3.2); Emails to Client re: settlement (.3)	\$850.00	3.5	\$2,975.00
Telephone Call/Prepare/Email 9/2/22 - Telephone call with Client re: settlement (1.1); Prepare draft Demand Letter and email to Client re: same (1.9)	\$850.00	3	\$2,550.00
Review/Respond/Revise/Email 9/5/22 - Review/Respond to Client email re: Settlement and Revise Demand Letter	\$850.00	0.7	\$595.00
Review/Revise/Edit/Prepare 9/6/22 - Review, revise, edit Mediation Memo; Prepare redacted/condensed admissions and other attachments re: same	\$850.00	4.2	\$3,570.00
Telephone Call/Prepare 9/7/22 - Prepare settlement demand/summary (.3); Telephone call with Court and Counsel re: Mediation (.2)	\$850.00	0.5	\$425.00
Telephone Call/Attend	\$850.00	2.9	\$2,465.00

9/12/22 - Telephone call with RL re: Mediation preparation and Focus Group recap with organizer (1.1); Attend Zoom Conference with client re: Mediation preparation and related preparation and review (1.8)

Prepare/Attend 9/13/22 - Prepare for Mediation Conference (.5); Attend Mediation/Settlement Conference (2.5)	\$850.00	3	\$2,550.00
Telephone Call/Prepare 9/26/22 - Telephone Call with RL re: MSJ-SUF (.1); Prepare SUF draft (6.9)	\$850.00	7	\$5,950.00
Prepare/Edit/Review 9/27/22 - Prepare, edit, review Draft JSUF	\$850.00	6.5	\$5,525.00
Prepare/Review/Revise/Edit/Email 9/28/22 - Prepare, review, revise, edit draft JSUF (10.3); Email to Client and RL re: same (.2)	\$850.00	10.5	\$8,925.00
Review/Revise/Edit 9/29/22 - Review, revise, edit Proposed JSUF (5.2); Review and prepare social media docs for production (1.8)	\$850.00	7	\$5,950.00
Telephone Call/Review/Revise/Edit 9/30/22 - Review, revise, edit draft Joint SUF (5.6); Telephone call with RL re: same (.3)	\$850.00	5.9	\$5,015.00
Email 10/3/22 - Email to RL re: A.W. issue/analysis	\$850.00	0.4	\$340.00
Review/Prepare 10/5/22 - Review discovery deposition exhibits; prepare MSJ appendix	\$850.00	2.8	\$2,380.00
Review/Prepare 10/6/22 - Review file and prepare appendix	\$850.00	4.8	\$4,080.00
Prepare 10/7/22 - Prepare draft MSJ	\$850.00	5.2	\$4,420.00
Prepare 10/10/22 - Prepare MSJ	\$850.00	10.3	\$8,755.00
Prepare/Attend 10/11/22 - Prepare MSJ (11.1); Attend Status Conference with Court (.4)	\$850.00	11.5	\$9,775.00
Prepare/Review/Revise/Edit 10/12/22 - Prepare, review, revise, edit MSJ	\$850.00	11.4	\$9,690.00
Prepare/Review/Revise/Edit 10/13/22 - Prepare, review, revise, edit MSJ (10.2); Finalize and file appendix (4.3)	\$850.00	14.5	\$12,325.00

Prepare/Review/Revise/Edit 10/14/22 - Prepare, review, revise, edit MSJ for filing	\$850.00	14.3	\$12,155.00
Prepare 10/17/22 - Prepare Amended MSJ memorandum to comply with page limitations (4.8); Review and analyze KU's draft SUF (1.0)	\$850.00	5.8	\$4,930.00
Review 10/18/22 - Review defendant's MSJ; outline response and email to RL re: same	\$850.00	4.1	\$3,485.00
Telephone Call/sResearch 10/19/22 - Telephone call with Judge Lloret re: settlement (.1); Research re: response to KU-MSJ (3.0); Telephone call with RL re: strategy for responding to defendant's MSJ and content and/or motion to strike (.5)	\$850.00	3.6	\$3,060.00
Telephone Call 10/20/22 - Telephone call with RL re: defendant's Motion to Amend and next steps	\$850.00	0.3	\$255.00
Prepare 10/24/22 - Prepare draft response to defendant's SUF	\$850.00	3.4	\$2,890.00
Telephone Call/Review/Revise/Edit 10/25/22 - Telephone call with Client re: MSJ response, procedural issues and strategy/status (1.6); Review, revise, edit draft response to defendant's SUF and annotate (2.2); Review SO deposition (2.9)	\$850.00	6.7	\$5,695.00
Email 10/27/22 - Email to Client re: MSJ status/strategy for response or motion to strike	\$850.00	0.1	\$85.00
Prepare/Review/Revise/Edit 11/1/22 - Prepare draft Motion to strike Defendant's MSJ (2.1); Review, revise, edit Response to Defendant's SUF (.4)	\$850.00	2.5	\$2,125.00
Telephone Call/Prepare/Review/Revise/Edit 11/2/22 - Telephone call with RL re: Motion to Strike/MSJ issues and strategy (.4); Prepare, review, revise, edit Motion to Strike and related research; Review and incorporate RL draft (3.9)	\$850.00	4.3	\$3,655.00
Telephone Calls/Review/Revise/Emails 11/3/22 - Telephone call with RL re: MSJ status and conference with Court (.3); Review, revise/Finalize Motion to Strike (1.6); Telephone call with Client re: MSJ status and Motion to Strike (.7); Emails to Client, OAG re: same (.2)	\$850.00	2.8	\$2,380.00
Telephone Call 11/8/22 - Telephone call with RL re: preparation for MSJ status conference with Judge Lloret	\$850.00	0.7	\$595.00

Telephone Calls 11/10/22 - Telephone call with Court and Counsel re: MSJ status and settlement (.2); Separate Telephone call with Judge Lloret re: settlement (.2)	\$850.00	0.4	\$340.00
Telephone Call 11/14/22 - Telephone call with Judge Lloret re: settlement	\$850.00	0.2	\$170.00
Telephone Call/Prepare 11/16/22 - Telephone call with Client re: status and next steps (1.2)	\$850.00	1.2	\$1,020.00
Review/Email 11/17/22 - Review KU's Response to MTS; Email to Client re: same	\$850.00	0.3	\$255.00
Prepare 11/22/22 - Prepare updated mediation materials and related correspondence for Judge L and Counsel	\$850.00	0.4	\$340.00
Email/Telephone Call 11/28/22 - Email to RL re: settlement planning (.2); Telephone call with Judge Lloret re: settlement (.1)	\$850.00	0.3	\$255.00
Email/Telephone Calls 12/6/22 - Email to RL and Client re: settlement strategy (.3); Telephone call with Judge Lloret re: settlement (.4); Telephone call with RL re: settlement issues and strategy (.4); Telephone call with Client re: same (.6)	\$850.00	1.7	\$1,445.00
Telephone Calls/Emails 12/21/22 - Telephone call with Client re: response to JW email (.2); Telephone call with RL re: same (.2); Email to Client re: same (.2)	\$850.00	0.4	\$340.00
Email 1/18/23 - Email response to Client re: MTS status (.1 N/C)	\$850.00	0	\$0.00
Attend 1/27/23 - Attend zoom call with Client re: status, settlement strategy and next steps	\$850.00	1.3	\$1,105.00
Email/Telephone Call 2/10/23 - Email to Client re: updates and ongoing ADA/CBA/RA issues (.3); Telephone call with OAG re: medical documentation (.1)	\$850.00	0.4	\$340.00
Research/Email 2/19/23 - Research re: recent developments and recommendations re: COVID and immune compromised individuals; Email to Client re: same	\$850.00	0.4	\$340.00
Email 2/20/23 - Email to Client re: ongoing access issues at KU	\$850.00	0.7	\$595.00

Zoom Conference/Prepare/Email 2/21/23 - Zoom conference with Client re: ongoing access issues and next steps (1.2); Email to Client re: same (.4)	\$850.00	1.6	\$1,360.00
Review 2/23/23 - Review Client articles re: online teaching/and remote RA	\$850.00	2.9	\$2,465.00
Email 3/28/23 - Email to Client re: status inquiry	\$850.00	0.2	\$170.00
Emails 4/4/23 - Emails to Client re: RA agreement in Joint Discovery Report	\$850.00	0.5	\$425.00
Emails 4/28/23 - Emails to Client re: DOE decision and ongoing retaliation claim in the federal case (.3 N/C)	\$850.00	0	\$0.00
Emails 5/2/23 - Emails to OAG and Judge L's Chambers re: settlement (.1); Email to Client re: same (.1);	\$850.00	0.2	\$170.00
Telephone Call 5/3/23 - Telephone call with RL re: status conference preparation and settlement strategy	\$850.00	0.4	\$340.00
Telephone Call/Prepare 5/4/23 - Prepare for status conference (.1); Telephone call with Judge L re: settlement (.4)	\$850.00	0.5	\$425.00
Telephone Call 5/5/23 - Telephone call with client re: status, settlement and collaboration re: related cases	\$850.00	2	\$1,700.00
Email 5/15/23 - Email to Client re: upcoming status conference with Judge L	\$850.00	0.1	\$85.00
Telephone Call 6/2/23 - Telephone call with Client re: feasible future-looking settlement options	\$850.00	1	\$850.00
Email 6/5/23 - Email to Judge L re: postponement of status conference	\$850.00	0.1	\$85.00
Email 6/15/23 - Respond to Client email re: status conference prep and change of Counsel at OAG	\$850.00	0.1	\$85.00
Telephone Call 7/12/23 - Telephone call with Client re: settlement strategy and MSJ status	\$850.00	1.7	\$1,445.00
Email	\$850.00	0.3	\$255.00

Review/Email/Telephone Calls 7/25/23 - Review MSJ decision (1.0); Email Client re: MSJ decision (.2); Telephone call with Client re: same (.3); Telephone call with RL re: MSJ decision and next steps (.2)	\$850.00	1.7	\$1,445.00
Telephone Call/Email 7/26/23 - Telephone call with RL re: Motion for Reconsideration strategy/substance; Email to RL re: same	\$850.00	0.6	\$510.00
Research 7/27/23 - Research/brief outlining re: Motion for Reconsideration; Consults with NELA colleagues re: same (.5)	\$850.00	1.5	\$1,275.00
Email 7/28/23 - Email to Union re: MSJ decision (.1 N/C)	\$850.00	0	\$0.00
Prepare/Research/Email 7/31/23 - Prepare Motion for Reconsideration (5.2); Research re: FRCP and local rules re: time for filing Motion (.5); Email to Client re: same (.1)	\$850.00	5.7	\$4,845.00
Prepare/Review/Revise/Edit/Emails 8/1/23 - Prepare, review, revise, edit Motion for Reconsideration (6.8); Emails with RL re: same (.3)	\$850.00	7.1	\$6,035.00
Prepare 8/2/23 - Prepare Motion for Reconsideration	\$850.00	6.8	\$5,780.00
Telephone Call/Prepare/Research 8/3/23 - Telephone call with client re: MSJ decision and Motion for Reconsideration (1.4); Prepare draft section on disparate impact (3.8); Research re: procedures for Motion for Reconsideration and disparate impact claims; Review cases (3.0)	\$850.00	8.2	\$6,970.00
Prepare/Telephone Calls/Research/Prepare 8/4/23 - Telephone calls with RL re: Motion for Reconsideration issues (.4); Prepare draft sections for Reconsideration Motion re: damage claims (6.3 N/C); Research Motion for Reconsideration and standards and Email to RL re: same (1.4)	\$850.00	1.8	\$1,530.00
Prepare/Review/Research/Edit/Revise 8/6/23 - Prepare, review, revise, edit Motion for Reconsideration (7.1); Research re: damage claims; review cases (3.2 N/C)	\$850.00	3.9	\$3,315.00
Prepare, Review/Revise/Edit 8/7/23 - Prepare, review, revise, edit Motion for Reconsideration	\$850.00	15.2	\$12,920.00
Prepare/Review/Revise/Edit 8/8/23 - Prepare, review, revise, edit and finalize Motion for Reconsideration	\$850.00	7.8	\$6,630.00

Telephone Call 8/10/23 - Telephone call with Inquirer representation re: MSJ decision and implications (N/C)	\$0.00	0.4	\$0.00
Email 8/11/23 - Email to Client re: next steps	\$850.00	0.1	\$85.00
Telephone Call 8/14/23 - Telephone call with Client re: settlement issues and case status	\$850.00	1.2	\$1,020.00
Email 8/15/23 - Email to RL re: prep for Judge L status conference	\$850.00	0.1	\$85.00
Telephone Calls/Email 8/16/23 - Telephone call with Court re: settlement (.4); Telephone call with RL re: preparation for status conference (.3); Email to OAG re: atty fees estimate for settlement (.1)	\$850.00	0.8	\$680.00
Emails 8/22/23 - Emails to Client re: KU - Revisit to RA request/research materials	\$850.00	0.4	\$340.00
Email 9/5/23 - Email to Client re: NCD Report and implications for Motion for Recon	\$850.00	0.1	\$85.00
Email 9/12/23 - Email to client re: reconsideration issues; next steps and new research materials	\$850.00	0.5	\$425.00
Telephone Call/Review/Research/Email 9/19/23 - Review KU Response to Motion for Reconsideration; evaluate need for further briefing and corresponding research; email to client re: same (1.9); Telephone call with RL re: same (.1)	\$850.00	2	\$1,700.00
Exchange/Discuss 10/30/23 - Exchange and discuss research materials with Client re: remote RA cases; Shepardize MSJ decision	\$850.00	0.5	\$425.00
Zoom Call 10/31/23 - Zoom call with Client re: potential settlement options	\$850.00	1.9	\$1,615.00
Telephone Call 11/1/23- Telephone call with RL re: settlement options	\$850.00	0.4	\$340.00
Emails 12/1/23- Emails to Client re: settlement and next steps	\$850.00	0.2	\$170.00
Zoom 12/15/23- Zoom conference re: settlement options	\$850.00	1.6	\$1,360.00

Prepare 12/21/23- Prepare draft email to OAG re: referral for mediation (.4); Draft to Counsel re: settlement/mediation (.3)	\$850.00	0.7	\$595.00
Email 1/9/24- Email to RL re: recon decision and next steps	\$850.00	0.3	\$255.00
Prepare 1/10/24- Prepare response to Law 360 reporter re: Recon Decision (.5 N/C)	\$0.00	0	\$0.00
Telephone Call 1/11/24- Telephone calls with Judge L re: settlement	\$850.00	0.1	\$85.00
Email 1/12/24- Email to Client re: settlement and Telephone call with Judge L.	\$850.00	0.2	\$170.00
Research 1/17/24 - Research re: retaliation and interference in remedies; draft proposed settlement ideas for Client review	\$850.00	2.5	\$2,125.00
Zoom/Research 1/18/24- Zoom call with Client (1.8); Research and file review re: poten- tial trial issues (2.0); Email to client re: same (.5)	\$850.00	4.3	\$3,655.00
Review/Research/Prepare 1/19/24- Review 3rd Circuit jury instructions re: retaliation; Email to client re: remedy issues (1.6); Research re: retaliation damages (1.5); Prepare for conference with Court (.6)	\$850.00	3.7	\$3,145.00
Email/Telephone Call 1/22/24- Status Conference re: trial schedule and damage claims (.3); Email to Client re: same (.1); Telephone call with RL re: damage issues (.2)	\$850.00	0.6	\$510.00
Prepare 1/23/24- Prepare draft settlement template; Email to Client re: same and info needed for back pay calculation	\$850.00	1.1	\$935.00
Telephone Call/Research 1/24/24- Telephone call with client re: settlement/backpay (.9); Research re: retaliation remedies (2.0 N/C)	\$850.00	0.9	\$765.00
Telephone Call/Prepare/Research 1/25/24- Telephone call with Client and Counsel re: settlement (.6); Telephone call with RL re: prep for status conf. (.3); Prepare for status conf. and settlement issues (.4); Research re: retaliation remedies and A.W issue (2.2); Telephone call with Client re: same (.6)	\$850.00	4.1	\$3,485.00

Prepare/Review 2/6/24- Prepare draft demand; Review previous settlement correspondence and research re: back pay, statutory interest and tenure buy-out templates	\$850.00	2.5	\$2,125.00
Prepare 2/7/24 Prepare draft demand letter for client review	\$850.00	4.8	\$4,080.00
Telephone Call 2/8/24- Telephone call with RL re: draft demand letter	\$850.00	0.4	\$340.00
Telephone Call 2/10/24- Telephone call with client re: settlement strategy	\$850.00	1.2	\$1,020.00
Review/Revise/Edit/Emails 2/12/24 - Review/Revise/Edit Demand Letter (1.1); Emails to Client re: Settlement Numbers (.6); Prepare Final Settlement Demand (.3)	\$850.00	2	\$1,700.00
Email/Correspondence/Telephone Conference 2/16/24 - Telephone call with Judge L. re: Settlement Status (.1); Telephone call with RL re: same (.1); Email to Client re: Telephone conference summary with Judge L. and next steps (.2)	\$850.00	0.4	\$340.00
Email 2/19/24 - Email to Client re: settlement status and trial schedule	\$850.00	0.3	\$255.00
Email/Correspondence 2/20/24 - Email to Client re: Settlement Issues	\$850.00	0.4	\$340.00
Zoom Call 2/21/24 - Zoom call with Client re: Settlement Issues	\$850.00	1.5	\$1,275.00
Telephone Call/Conference 3/6/24 - Telephone call with RL re: Trial Prep/Settlement	\$850.00	0.4	\$340.00
Email/Correspondence 3/7/24 - Email to RL re: Retaliation Issue	\$850.00	0.3	\$255.00
Zoom Conference Call/Review 3/11/24 - Zoom call with Client re: Settlement (1.4); Review Scholarly Articles re: Cummings (1.8)	\$850.00	3.2	\$2,720.00
Research/Email 3/13/24 - Research retaliation remedy issue (2.1); Email to RL re: settlement and trial issues (.4)	\$850.00	2.5	\$2,125.00
Attended 3/15/24 - Attended Zoom Conference re: Retaliation Issues	\$850.00	0.4	\$340.00
Telephone Call/Prepare 3/22/24 - Telephone call with RL re: Rehab Claim (.7); Prepare memo re: Rehab Damages (2.3)	\$850.00	3	\$2,550.00

Email 3/26/24 - Email to Client re: Damages issues/research summary and prep for status conference	\$850.00	0.8	\$680.00
Telephone Calls/Prepare/Research 3/27/24 - Telephone call with Client & RL re: Retaliation Claim (.8); Prepare for Status Conference; Research re: Remedies (1.3); Telephone Calls with RL re: Retaliation Claim & Strategy (.5); Update research re: Section 1983 (A.W) issue (.5)	\$850.00	3.1	\$2,635.00
Status Call/Prepare/Telephone Call 3/28/24 - Status call with Court re: Trial Prep and Final Disposition (.3); Prepare for Status Conf.; Research re; Stip. of Dismissal (1.4); Telephone Call with Client re: Status Conf. and Stip re: Retaliation Claim (.3); Telephone call with RL re: same (.2)	\$850.00	2.2	\$1,870.00
Edit/Email 4/1/24 - Edit Stip. & Dismissal (Retaliation Claim) (.2); Email to Client re: same (.1); A.W. Research in 3d Cir. (.5)	\$850.00	0.8	\$680.00
Email/Research 4/4/24 - Email to Client responding to Q's re: finalizing judgment-related issues (.3); Research re: fees issues for Petition (1.8)	\$850.00	1.1	\$935.00
Emails 4/9/24 - Email/Correspondence Response to Client re: mediation status (.1); Email to OAG re: back pay (.1)	\$850.00	0.2	\$170.00
Telephone/Conference Call 4/11/24 - Telephone call with Judge L. re: settlement status (.2); Telephone call with RL re: settlement and fee petition prep (.3)	\$850.00	0.5	\$425.00
Email/Correspondence 4/12/24 - Email to Client re: Telephone call with Judge L.	\$850.00	0.2	\$170.00
Email/Research 4/29/24 - Email response to Client questions re: conferences with Court and related substantive issues (.3); Research re: fee issues for Petition (1.8)	\$850.00	2.1	\$1,785.00
Research 4/30/24 - Research re: fee petition prep	\$850.00	1.2	\$1,020.00
Research 5/1/24 - Research re: fee petition and prep issues	\$850.00	3.1	\$2,635.00
Research 5/2/24 - Research re: statutory interest on back pay and fee awards	\$850.00	1.2	\$1,020.00
Email 5/14/24 - Email to Client re: back pay and economic issues	\$850.00	0.2	\$170.00

Review/Analyze/Email 5/15/24 - Review/Analyze back pay info (.5) Email to Client re: back pay analysis (.4)	\$850.00	0.9	\$765.00
Update Research 5/24/24 - Update Research re: fee petition issues	\$850.00	1.5	\$1,275.00
Prepare/Review/Attend 5/31/24 - Prepare and Review Initial back pay calculations (.5); Attended Zoom meeting w/ Client re: back pay numbers/discrepancies/finalization issues (1.4)	\$805.00	1.9	\$1,529.50
Prepare/Review/Revise/Edit/Draft/Emails 6/3/24 - Prepare, review, revise, edit back pay analysis and draft template for Final Order (5.1); Emails to OAG and Client re: same (.3)	\$850.00	5.4	\$4,590.00
Telephone Call/Email 6/4/24 - Telephone call with Court re: Prep for Final Order (50%) (.2); Email to Client re: same and next steps (.2)	\$850.00	0.4	\$340.00
Review/Revise/Edit/Telephone Call 6/5/24 - Review, revise, edit Joint Economic Report doc (0.2); Telephone Call with Client re: same (1.0)	\$850.00	1.2	\$1,020.00
Emails/Prepare/Review/Revise/Edit/Update 6/11/24 - Emails to RL re: Fee Petition and mediation (.4); Prepare, review, revise, edit, update LM CV and related internet research (PACER & LEXIS) (3.5); Emails to Client re: KU demand for medical letter and mediation correspondence from Judge Straw (.6)	\$850.00	4.5	\$3,825.00
Telephone Conference Call 6/13/24 - Telephone conference call with Client, Counsel & Court re: mediation (.3); Email to Client re: same (.3); Email to RL re: Time Sheets (.1); Email to Client re: HR Letter/related issues re: Spring 2025 (.3)	\$850.00	1	\$850.00
Prepare 6/17/24 - Prepare Draft Email to OAG re: Spring 2025 RA	\$850.00	0.4	\$340.00
Prepare 6/18/24 - Prepare Email to Counsel re: medical letter/RA Spring 2025	\$850.00	0.3	\$255.00
Email 6/19/24 - Email to Client re: Follow up to back pay and document request for Joint Economic Stipulation	\$850.00	0.3	\$255.00
Emails/Review/Revise/Edit 7/1/24 - Email to OAG re: economic issues; Review, revise, edit back pay calculations and draft report (1.0); Emails to Client re: medical letter (.2)	\$850.00	1.2	\$1,020.00
Prepare/Review/Revise/Edit/Email	\$850.00	1.7	\$1,445.00

Email/Review/Revise/Edit/Research 7/3/24 - Telephone call with OAG re: Draft Report (.2); Emails to Client re: same and disputed remedial issues (.3); Review, revise, edit Draft Report and calculations (1.0); LEXIS/Internet Research re: restoration/restitution of sick time (2.5 N/C)	\$850.00	1.5	\$1,275.00
Telephone Call/Review/Revise/Edit/Email 7/8/24 - Telephone call with OAG re: Revision/Finalization of Joint Report (.3); Review, revise, edit Joint Report/KU Revisions (.8); Email to Client re: same (.1)	\$850.00	1.2	\$1,020.00
Email 7/9/24 - Email to Client re: Joint Report	\$850.00	0.2	\$170.00
Prepare 8/5/24 - Prepare draft Fee Declaration and related research	\$850.00	2.1	\$1,785.00
Email/Prepare/Review/Edit 8/6/24 - Email to outside counsel re: Fee Petition Strategy (.5); Prepare Declaration and review/edit 2021 Time Slips/Review e-mail record (5.3)	\$850.00	5.8	\$4,930.00
Emails/Prepare/Review/Revise/Edit/Research 8/7/24 - Email to Consulting Atty re: Fee Declarations (.4); Prepare/Edit Fee Declaration (1.7); Research re: Fee Petition/CLS Rates; Email to RL re: same (1.6)	\$850.00	3.7	\$3,145.00
Telephone Calls/Prepare/Research/Review/Revise/Edit 8/8/24 - Telephone call with RL re: Fee Petition Attorney Rates (.7); Prepare/Outline Fee Motion (1.2); Review, revise, edit Fee Declaration (1.3) (N/C); LEXIS Research re: recent attorney's fee cases and CLS Fee Schedule (2.3); Telephone conference calls with outside counsel re: Consults re: Fee Petition (.9)	\$850.00	5.1	\$4,335.00
Telephone Calls/Review/Revise/Edit/Research 8/9/24 - Telephone calls with CLS re: Fee Petition strategy and materials (1.5); Review, revise, edit 2022 Jan-May Time Slips and corresponding file materials (2.0) (N/C); Research re: Fee Petition CLS Rates/Judge S. decisions (1.8)	\$850.00	3.3	\$2,805.00
Review/Revise/Edit 8/12/24 - Review, revise, edit Time Slips - June 2022 - Dec 2023 and corresponding file review (6.0) (N/C)	\$850.00	0	\$0.00
Prepare/Review/Revise/Edit/Email 8/13/24 - Prepare, review, revise, edit Time Slips (2024) and corresponding file review (4.0) (N/C); Review Hershey consult with client re: updated medical report (.3)	\$850.00	0.3	\$255.00
Email 8/14/24 - Email to Counsel re: RA for Spring 2025	\$850.00	0.2	\$170.00

Email 8/29/24 - Email to RL re: Fee Petition Prep	\$850.00	0.2	\$170.00
Prepare 9/5/24 - Draft Motion for Final Order and corresponding File Review	\$850.00	1	\$850.00
Prepare/Correspondence/Research/Review 9/6/24 - Research Final Order/Injunctive Relief; Review EEOC/Interference Guidance (1.0); Prepare Motion for Final Order and correspondence with Client re: same (.5)	\$850.00	1.5	\$1,275.00
Email 9/7/24 - Email to Client and RL re: Injunctive Order, Research, Points to be included and record support	\$850.00	1.8	\$1,530.00
Telephone Call/Prepare/Email 9/10/24 - Telephone call with OAG re: Spring 2025 RA (.2); Prepare Motion for Final Order/Proposed Order and related e-mail correspondence with Client re: same (1.5)	\$850.00	1.7	\$1,445.00
Zoom Meeting 9/11/24 - Attended zoom meeting with Client re: final order issues strategy; RTC issues and next steps	\$850.00	2	\$1,700.00
Telephone Call/Prepare/Review/Revise/Edit 9/12/24 - Prepare, review, revise, edit Final Order Motion and Memo (3.9); Telephone call with OAG re: Spring 2025 RA (.2)	\$850.00	4.1	\$3,485.00
Prepare/Review/Revise/Edit/Email 9/13/24 - Prepare, review, revise, edit Final Order package and related correspondence to Client and RL (5.1); Email to RL re: Final Order and Fee Petition (.2)	\$850.00	5.3	\$4,505.00
Emails/Prepare/Review/Revise/Edit/Finalize 9/16/24 - Email to OAG re: Spring 2025 RA (.3); Prepare, review, revise, edit & finalize Final Order and LEXIS Research re: same (3.5); Emails to Client re: same (.2)	\$850.00	4	\$3,400.00
Telephone Call 9/19/24 - Telephone call with OAG re: Motions for Final Order	\$850.00	0.1	\$85.00
Email 9/29/24 - Email to Client re: RA marking issue and Injunctive Order/Request	\$850.00	0.2	\$170.00
Email/Telephone Calls/Prepare/Attend 10/2/24 - Email to Client re: Status Conference & Issues with Case (.4); Telephone calls with RL re: Prep for Status Conference and recap (.7); Prep for Status Conference/Review motions and attachments (.4); Attended Status Conference with Court re: Motions for Final Order (.6);	\$850.00	2.1	\$1,785.00
Zoom Call	\$850.00	1.5	\$1,275.00

Research 10/17/24 - Research re: Injunctive Remedies in Civil Rights cases	\$850.00	1.2	\$1,020.00
Email 10/18/24 - Email to Client re: KU Response to Final Order	\$850.00	0.1	\$85.00
Research 10/22/24 - Research re: Reply to KU's Response to MFFO	\$850.00	2.2	\$1,870.00
Research/Read 10/23/24 - Research/Read KU Cases re: MFFO	\$850.00	2.5	\$2,125.00
Email/Review/Revise/Edit 10/26/24 - Email to Client re: Reply Brief and Evidentiary Issues (.3); Review, revise, edit KU Reply Brief and LEXIS Research re: same (1.5)	\$850.00	1.8	\$1,530.00
Prepare/Review/Revise/Edit/Telephone Call 10/28/24 - Prepare, review, revise, edit Reply Brief (4.8); Telephone Call with Client re: same (.6)	\$850.00	5.4	\$4,590.00
Email/Telephone Call 11/12/24 - Email to client re: status and next steps re: Final Order (.1); Telephone call with RL re: same (.3)	\$850.00	0.4	\$340.00
Telephone Call 12/18/24 - Telephone call with client re: status and next steps	\$850.00	0.2	\$170.00
Correspondence/Email 12/23/24 - Letter to Judge S re: Status conference; Email to client re: same	\$850.00	0.2	\$170.00
Research 1/8/25 - Research re: recent attorney's fees awards in EDPA	\$850.00	1	\$850.00
Email 1/13/25 - Email to client and court re: status of MFFO	\$850.00	0.2	\$170.00
Email/Review 1/22/25 - Email to client re: Final Order (.1); Review/edit time sheets for accuracy and billing judgment (1.8)	\$850.00	1.9	\$1,615.00
Prepare/Edit 1/23/25 - Prepare Fee Petition/Edit proof time sheets/compile Appendix and related preparation activities	\$850.00	4	\$3,400.00
Prepare/Research 1/24/25 - Index fee invoices/prepare for Fee Brief (2.0); research/update cases re: EDPA attorney's fees	\$850.00	4.6	\$3,910.00

Preparation 1/27/25 - Preparation of Fee Petition and related research	\$850.00	4.6	\$3,910.00
Finalize 1/27/25 - Finalize edits of fee invoice (N/C)	\$850.00	0	\$0.00
Email/Correspondence/Prepare 1/28/25 - Email correspondence to RL re: Bill of Costs and Strategy/Issues re: Fee Brief (.4); Prepare Fee Petition/Memo of Law (6.2)	\$850.00	6.6	\$5,610.00
Prepare/Review/Revise/Edit 1/29/25 - Prepare and Review, Revise and Edit Fee Brief	\$850.00	8.4	\$7,140.00
Prepare/Review/Revise/Edit 1/30/25 - Prepare Fee Brief (5.1); Review, revise, edit Invoice/Billing judgement review (1.0) (N/C)	\$850.00	5.1	\$4,335.00
Prepare/Review/Revise/Edit 1/31/24 - Prepare, review, revise, edit Fee Brief	\$850.00	9.2	\$7,820.00
Review/Revise/Edit/Attended 2/1/25 - Review, revise, edit Fee Brief; Review and incorporate RL Timesheets; Finalize Brief and Declaration/Revise	\$850.00	4.1	\$3,485.00

Subtotal 773,074.50

Tax 0.00

Total 773,074.50

Amount Paid 0.00

Amount Due (USD) \$773,074.50

Terms

Payment Due Upon Receipt.

Payment can be made online by Paypal, Credit Card, or check payable to: McKinley & Ryan, LLC

Thank you!

INDEX TO McKINLEY & RYAN INVOICE¹

Intake/initial file review/consultation initial research and Case Evaluation	10/08 - 11/08/2021	LM	22.4
Complaint preparation, including background work, research, consultation with Client and others re: factual background and litigation strategy, and draft/edit/finalize Complaint	11/08-11/15/2021	LM	48.7
Activities Related to Research, Preparation and Service of Motion for TRO	11/16/-24/2021	LM	67.9
Litigation of TRO and related activities	11/29-12/14/2021	LM	14.8
Activities related to the implementation of the TRO and Extension of the TRO	12/20/2021-01/07/2022	LM	17.4
Activities related to preparation and planning for discovery, SED's and early written discovery	01/11 - 02/16/2022	LM	23.6
Execution of discovery plan and completion of discovery	02/24-08/17/2022	LM	213.4
Settlement Evaluation and Focus Group	08/19-08/27/2022	LM	56.0
Settlement Process with Judge Lloret	08/30-09/13/2022	LM	18.7
Activities Related to Planning, Preparing, and finalizing Plaintiff's Motion for Summary Judgment, Statement of Undisputed Facts and MSJ Appendix	09/26-10/14/2022	LM	117.9
Evaluating KU's MSJ, Researching & Preparing to Respond and Motion to Strike	10/18/2022-11/03/2022	LM	27.8

¹ The purpose of this index to the Invoice for McKinley & Ryan, LLC is to show in general categorical and chronological terms how Ms. McKinley spent her time on the case. These are general summaries designed to assist the Court, and do not necessarily include every entry that appears on the invoice. By no means does it constitute a waiver of any of the entries that appear on the invoice but may not appear in a specific category on the index.

Continued Settlement Process with Judge Lloret	11/08-01/27/2023	LM	6.5
Evaluation and Response to KU's Proposed Alternative RA, Ongoing Access Issues at KU, and Retaliation	12/21/-04/28/2023	LM	7.4
Ongoing Settlement Process with Judge Lloret	05/02/-07/19/2023	LM	6.4
Evaluation of MSJ Decision and Activities Related to Motion for Partial Reconsideration	07/19-08/08/2023	LM	73.1
Ongoing Settlement Process with Judge Lloret	08/11-08/16/2023	LM	2.6
Activities Related to Evaluation of KU Reconsideration Brief and Decision to File No Reply	09/05-09/19/2023	LM	2.6
Prepare Template for Continued Settlement Process with Judge Lloret	10/30/23-02/16/2024	LM	5.3
Continued Planning & Consultation with Client and OAG re: Settlement Evaluation, Ongoing Settlement Process with Judge Lloret	02/19 - 04/12/2024	LM	12.9
Activities Re: Disposition of Pending Claims and Trial Prep	03/27/-04/29/2024	LM	10.1
Activities Related to Planning, Preparation & Collaboration re: Undisputed Elements of Economic Relief		LM	16.2
Activities Related to Planning, Preparation and Drafting/Finalizing Motion for Final Order	09/06-09/16/2024	LM	27.1
Activities Related to Planning, Preparation and Drafting/Finalizing Reply Brief re: Motion for Final Order and Ensuing Status Conference	10/18-10/28/2024	LM	24.7
Preparation and Research re: Fee Petition	04/29/-06/13/2024	LM	10.4
	08/15-08/29/2024	LM	34.2
	01/08-02/01/2025	LM	51.4

DATE: February 4, 2025